DRAFT MEETING SUMMARY

CAL/OSHA HEAT ILLNESS ADVISORY PROCESS 8TH MEETING NOVEMBER 14, 2005 OAKLAND, CALIFORNIA

Attendees

Barry Bedwell, California Grape and Tree Fruit League

Emanuel Benitez, California Rural Legal Assistance Foundation

Kevin Bland, Residential Framing Contractors Association

Jodi Blom, California Framing Contractors

Kim Bolan, California Department of Forestry and Fire Protection

Katherine Boomus, Occupational Medicine Resident - Cal/OSHA

Carl Borden, California Farm Bureau Federation

Bo Bradley, Panatonni & Associated General Contractors

Dan Bradway, CC Myers

Louie Brown, Kahn, Soares, Conway

Juli Broyles, California Chamber of Commerce

Tom Burke, Petersen Dean, Inc.

Ed Calderon, Shea Homes

Mark Carleson, County of Riverside

George Daniels, Farm Employers Labor Service

Bob Downey, Construction Employers Association

Scott DuPriest, John F. Otto, Inc.

Marcia Dunham, Pacific Gas & Electric Company

Hamilton Fairburn, Organization Resources Counselors

Jeff Ferrell, Senior Industrial Hygienist DOSH

Roy Gabriel, California Farm Bureau

Keith Gibbs, Communication Workers of America Local 9412

Sean Givens, Communication Workers of America Local 9423

Favian Gonzalez, UNITE-HERE

Rosa Greenhalgh, Armstrong Associates

Martha Guzman, California Rural Legal Assistance Foundation

Wendy Holt, Alliance of Motion Picture and Television Producers

Michael Horowitz, District Manager DOSH

Sam Iler, Associated General Contractors San Diego

William Jackson, Granite Construction

Derrick Jarvis, E&J Gallo Winery

Steve Johnson, Associated Roofing Contractors of the Bay Area Counties

Anne Katten, California Rural Legal Assistance Foundation

Jim Kegebein, Safety Consultant

Dana Lahargone, Construction Employers Association

Vince Lamaestra, Pacific Maritime Association

Kevin Lancaster, Veen Law Office

Dan Leacox, Greenberg Taurig LLP

Kerry Lee, California Restaurant Association

Peter Lupo, San Diego AGC

Etta Mason, Southern California Edison

Marcie McClean, Labor @ Large

John McCoy, Lakeview Professional Services

Georgina Mendoza, California Rural Legal Assistance Foundation

Rob Neenan, California League of Food Processors

Michaela Onstad, U.C. Davis Dept. of Public Health

Nancy Palandati, California Rural Legal Assistance Foundation

Janice Prudhomme, California Department of Health Services

Randy Riffe, Communication Workers of America Local 9412

Brenda Roach, Unger Construction

Richard Rocha, Laborers Training Center Northern California

John Robinson, California Attractions and Park Association

Mercedes Roldan, UNITE HERE Local 75

Howard Rosenberg, University of California, Berkeley

John Salmassy, Berg Electric

Cindy Sato, Construction Employers Association

Jason Schmelzer, California Manufacturing and Technology Association

Fran Schreiberg, WorkSafe

Jeremy Smith, California Labor Federation AFL-CIO

Dawn Smith, Engineering and Utility Contractors Association

Margaret Song, Occupational Medicine Resident - Cal/OSHA

Marti Stroup-Fisher, Associated General Contractors of California

Alex Tejeda, Communication Workers of America Local 9509

Kevin Thompson, Cal-OSHA Reporter

Beth Treanor, Phylmar Regulatory Roundtable

Julie Trost, Mason Contractors Association

Valerie Velasquez, Labor Occupational Health Program U.C. Berkeley

Phil Vermeulen, Engineering Contractors Association

Chris Walker, California Chapter Sheet Metal and Air Conditioning Contractors' National Association

Jay Weir, SBC Communications

Bruce Wick, California Professional Association of Specialty Contractors

John Young, Communication Workers of America Local 9509

Cal/OSHA Staff

Len Welsh, Acting Chief, DOSH Tom Mitchell, Senior Industrial Hygienist, Cal/OSHA Standards Board Bob Barish, Senior Industrial Hygienist, DOSH Bob Nakamura, Senior Industrial Hygienist, DOSH

Extracts of Major Discussion Topics

Emergency Medical Response Requirements: Representatives of California Rural Legal Assistance Foundation presented a proposal for modifications to Title 8 sections 3400 and 3439 for first aid and emergency medical response. Employer representatives said that amendments to these rules of general application should be developed in a separate advisory process because their application goes beyond heat illness. Labor representatives said that if 3400 and 3439 were not strengthened it would be essential to add emergency medical response planning requirements to section 3395. One employer representative suggested that it would be acceptable for the emergency response training procedures in section 3395 to be required to be developed in written form.

Presentation on Reports of Heat Illness: Employer representatives said that in addition to the case report information presented they would like to see citation information for DOSH heat illness investigations. A labor representative said that DOSH citations were not an accurate basis for deciding on what should be included in a standard for heat illness. Both sides said they were interested in seeing an analysis of factors present in the cases investigated in 2005 which Len Welsh said was being worked on.

Scope – **Application to Indoor Workplaces:** Len Welsh said that with the timeframe short for developing the permanent rule for heat illness he favored a separate process to consider a rule for indoor workplaces after the permanent rule for outdoor workplaces was finalized. A number of employer representatives voiced support for this approach.

Trigger: Labor representatives advocated for a trigger for additional requirements for extreme heat, especially additional hourly rest breaks. Some employer representatives supported a trigger for 3395 while some were concerned that the existing trigger language is vague. There was discussion of whether the Standards Board had the authority to adopt rest breaks as a heat illness control measure. Two labor representatives said it was important to prevention of heat illness during periods of extreme heat to have a mandatory break schedule because neither employees nor their employers could reliably detect the early stages of heat illness, and in some instances employees might feel intimidated from asking for the rest and recovery period required in 3395.

Shade: The requirement of 3395(f) for the Standards Board to review the feasibility of a requirement for shade for all rest periods at outdoor places of employment was noted by Len Welsh. A number of employer representatives said that a major difficulty with a requirement for shade is that at some large outdoor workplaces it is not practical to provide shade for the large number of employees who might all be seeking it at the same time.

Drinking Water: A number of construction representatives felt that the requirement for the specific capability to provide one quart of water per employee per hour was not necessary to prevent heat illness and was overly burdensome. They felt that a requirement for "sufficient quantities" of drinking water was adequate. A physician from the California Department of Health Services said that consumption of up to one quart of water per hour during periods of high heat and work was widely recognized and recommended by medical authorities as appropriate and necessary to prevention of heat illness.

Other issues: See the last page of the summary below.

Meeting Summary

Len Welsh opened the meeting and thanked everyone for their participation. He made the following two points regarding development of the permanent rule for heat illness:

- 1. To enable it to take effect before expiration of the second 120 days of the emergency temporary rule it would be necessary for the Division to have a proposal for the permanent rule to the Standards Board by the end of 2005.
- 2. He said he believed it was preferable to have just one standard for heat illness prevention, rather than standards for individual industry sectors as has been proposed by construction employers.

Len Welsh said that the topics of discussion for today's meeting were: shade, drinking water quantity specification, a standard for indoor workplaces, emergency response, trigger, and scope. He also said there would be a presentation on reports of heat illness in California.

There was discussion of comments on the minutes for the meeting of September 20, 2005. These changes will be made and revised minutes posted on the DOSH website.

Emergency Medical Response Requirements

Len Welsh noted that of existing regulations in Title 8 for first aid and emergency medical response (EMR), section 1512 in the Construction Safety Orders is the most detailed. He also noted that there have been questions with application of section 3400 to agriculture on items where section 3439 did not have requirements.

Bob Barish noted that one of the clearest issues with sections 3400 and 3439 is with the limitation of the requirements for EMR in 3400(f) to only "isolated," locations, and the limitation of the requirements of section 3439(b) for both first aid training and EMR to "remote" locations. He said that a footnote in one Decision After Reconsideration had suggested that these terms could be understood to mean locations beyond a 30-minute response time to a call to 911 or other emergency service provider. Bob Barish said this interpretation made it an issue in most urban fringe areas whether employers in general industry and agriculture were under the requirement to make provisions to avoid unnecessary delay in obtaining medical treatment for serious injuries.

Representatives of California Rural Legal Assistance Foundation circulated their proposal for amending sections 3400 and 3439 with respect to first aid and emergency medical response. The discussion focused on their suggestions to delete the limitations of the requirements for EMR planning for serious injury only to "isolated" or "remote" locations. Their proposal also addressed informing employees of the employer's procedure for responding to injury or illness and a requirement for a written plan addressing provision of emergency medical services. The proposal also referred to "implementing" emergency procedures and plans. The CRLAF proposal for agriculture (section 3439) also provided that there be a requirement for two employees trained in first aid for every 20 employees working. The CRLAF proposal, along with other documents noted in these minutes, is posted at the heat advisory area of the DOSH website (http://www.dir.ca.gov/dosh/doshreg/HeatStressMeetings2005.html).

Juli Broyles asked if the CRLAF proposal meant that employers would have to keep a response team standing by at all times in event of injury or illness. Anne Katten said no, that what was being proposed is a requirement for planning for response to serious injury and illness.

Carl Borden said that the discussion had been helpful to highlight the differences in language between the standards for emergency medical response for the different industries. But he said that another advisory process would be needed to address these issues separate from the permanent standard for heat illness prevention. Len Welsh said that if agreement could not be reached on modifying sections 3400 and 3439 that it would be important to more fully address emergency medical response planning in the permanent rule for heat illness. Martha Guzman said that employer failures to plan for emergency response to symptoms of heat illness have resulted in deaths and could contribute to more during the hot season in 2006. Fran Schreiberg concurred that the existing requirements are not adequate and said that if the general requirements in Title 8 for first aid and emergency response could not be addressed then appropriate requirements for responding to heat illness should be added to section 3395.

Marti Stroup-Fisher said she was concerned with modifications to section 1512 or additional requirements specific to heat illness. Len Welsh suggested reference in section 3395 to specific relevant parts of section 1512. Juli Broyles said it would be confusing for a regulation of general application to be referring to a standard for a specific industry. Willie Washington asked if Len's suggestion would mean that employers would have to develop a separate emergency response plan for individual hazards. Len Welsh said no, a general plan is sufficient unless a particular hazard necessitates special planning.

John Young suggested that emergency response could be incorporated as a general part of the Injury and Illness Prevention Program requirement of section 3203. Carl Borden said under existing language of 3395 employers must train employees on emergency response procedures for heat illness. He said as a compromise to what had been discussed that it would be acceptable to require that the training procedure for emergency medical response for heat illness be in writing.

Presentation on Reports of Heat Illness

Bob Barish gave a presentation on reports of heat illness in California. The presentation included 12 slides which are an attachment to these minutes. The presentation noted that the Department of Industrial Relations has four sources of information related to reports of heat illness:

- Investigations of fatal and nonfatal heat-related incidents reported to DOSH
- Information from the annual survey sampling of employers' Log 300 records
- Information from the Workers Compensation Insurance Rating Bureau
- Claims filed for workers compensation insurance for nature of injury "heat prostration"

A summary of the reports is as follows:

Incident Investigations: From 1995-2004, there were 31 heat-related cases investigated by the Division with 15 being fatalities. Of the 31 cases, 18 were in agriculture, 9 in construction, 2 in wildland firefighting, and 2 in manufacturing (both due to ambient heat rather than a hot process). In 2005, there were 24 investigations of possible heat-related incidents occurring between May 13 and August 1. Of these 24, by the time of the meeting 3 had been determined not to be heat-related, 16 were determined to be heat-related (including 5 fatalities), and 5 still had medical information outstanding needed for the determination of heat-relatedness. Of the 24 cases investigated, 11 were in agriculture and 8 were in construction.

Annual Survey: For years 2002, 2001, 1999, 1997, and 1995 the survey estimates for nonfatal cases with "days away from work" in California private industry due to "exposure to environmental heat" were 98, 58, 66, 97, and 114 respectively. For those years (except 1999) estimates for the numbers n manufacturing could be made (ranging from 15 to 28), and in mining in 1999 (9 cases). The survey ample sizes were not large enough to enable statistically reliable estimates for days away from work cases for other industries.

Workers Compensation Insurance Rating Bureau (WCIRB): Reports limited to workers compensation claims for death, permanent disability, or temporary partial and temporary total disability claims exceeding \$5,000 (indemnity and medical). For 2002 the WCIRB reported for nature of injury "heat prostration," 6 claims in professional and clerical services, 7 in manufacturing, 2 in construction, and 2 in other industries.

Workers Compensation Information System (WCIS): For each of the calendar years 2001-2004, there were between 300 and 360 claims filed for workers compensation insurance in the WCIS with nature of injury code 32 "heat prostration." Claims were filed in a wide range of industries and occupations, including some which appear to be indoor work. Claims in the WCIS are simply the number filed, and do not reflect findings of adjudication.

William Jackson said that what was missing from the presentation was information on the causes of individual heat illness cases and whether section 3395 or other requirements would contribute to preventing such incidents. Janice Prudhomme said that section 3395 addresses some of the key points of recognized heat illness prevention measures and that other measures being discussed such as rest breaks and acclimatization are widely recognized as effective and critical to heat illness prevention.

Martha Guzman asked how many of the 2005 cases had shade, rest breaks, and effective emergency response.

Len Welsh responding to Mr. Jackson and Ms. Guzman said that for the 2005 cases determined to be heat-related the Division would be gathering the details surrounding their occurrence to address the question of why the events occurred and what might have contributed to their occurrence and measures that might have helped prevent them.

Juli Broyles and other employer representatives asked for information on citations issued in heat illness incident investigations. Len Welsh said he would provide that when it became available for the 2005 cases which he said were handled with a coordinated approach and thus would provide the most meaningful information. Fran Schreiberg said that while citations might suggest incident causes, their presence or absence should not be relied on as indicators of what is needed in a regulation for prevention. She said that what is important would be to perform

a cause analysis for the heat-related incidents as Len Welsh described was being done for the 2005 cases investigated by DOSH.

Scope – Application to Indoor Workplaces

Len Welsh said that at the last meeting suggestions were made by labor representatives that indoor workplaces be covered by a regulation to prevent heat illness. He said that with the short timeframe to develop and adopt the permanent rule it would probably be better to go ahead with a regulation limited to outdoor workplaces and plan for discussion on indoor workplaces after that. Juli Broyles agreed it was appropriate to consider indoor requirements separate from those for outdoor workplaces. Others including John Robinson and Bruce Wick agreed with this sentiment.

Bruce Wick asked if a regulation to address risk of heat illness indoors could affect construction. Len Welsh said that it might.

Len Welsh also noted that the scope for indoor coverage might be limited. For example workplaces with functioning heating ventilating and air-conditioning (HVAC) systems could probably be left out as the risk in those workplaces would probably be minimal.

Trigger

Labor representatives supported trigger levels for additional requirements for extreme heat, most notably rest breaks.

Len Welsh noted that the AGC proposal for a separate standard for the construction industry had no trigger, that it applied all the time. John Robinson said that the trigger in existing 3395 is vague. He said that a temperature-based trigger that could result in requirements for additional breaks would complicate operations at amusement parks because staffing is planned weeks in advance. Len Welsh said that the requirements of 3395 are pretty basic: water, shade, and training including in how to deal with emergencies. He said these are steps most employers probably take already to some extent already to address heat illness risk. He said that removing the existing triggering language in 3395 could simplify the standard. Jason Schmelzer agreed with that sentiment.

Bob Downey said that use should be made of National Weather Service reports as a triggering mechanism. He said that not having a trigger was overly burdensome.

Len Welsh asked attendees about a trigger for extreme heat conditions. Fran Schreiberg said that the WorkSafe proposal calls for additional rest breaks based upon National Weather Service reports of high or extreme heat conditions. She said that breaks in cooled areas are well-documented as effective preventive measures for heat illness. She said it was critical not to require and rely on employees asking for a break in order to prevent or recover from heat illness symptoms. She said there are too many disincentives to employees asking for such breaks and that employees often don't know when they are in the early stages of heat illness and need a break to cool down. She also said that more documentation was needed to justify limiting the required rest and recovery period in 3395 to 5 minutes.

Jason Schmelzer said the WorkSafe proposal for triggering additional rest breaks was overly complicated particularly if it required gathering information on temperature and humidity.

Fran Schreiberg said that in some situations of extreme heat it was simply necessary to have additional breaks in shaded or cooled areas to address the risk of heat illness. She reiterated her concern that breaks not be dependent on employees asking for them. She said that having specific trigger levels at fairly high temperatures was a compromise from requiring additional breaks any time the heat illness regulation would apply.

Emanuel Benitez said that in the Coachella Valley temperatures can exceed 125 degrees Fahrenheit. He said it was important to consider the culture of the workplace. He said that in many agricultural workplaces employees avoid drinking water or taking rest breaks because of the time it takes away from meeting their assigned quota. He said that often if a quota is not met an employee can expect to be disciplined or dismissed.

Len Welsh asked if the current training requirements in 3395 were sufficient to cover breaks and drinking water in extreme heat. Marti Stroup-Fisher and Juli Broyles said that training should be sufficient to address the risk. Fran Schreiberg said that training requirements alone were not enough to address the hazard of extreme heat.

Juli Broyles said that requiring rest breaks for heat illness prevention was beyond the authority of the Standards Board. Len Welsh said that the requirements of the standard for inorganic lead for medical removal show that the Board does have authority to require administrative controls if they are needed to prevent risk. Juli said the lead standard was different in that it was a mandated adoption from federal OSHA. Martha Guzman said that the Board had the authority to require additional rest breaks to address heat illness risk.

Martha Guzman said that the problem with relying on employees to request a rest and recovery break is that they may not recognize when it is needed so it's important that it be mandatory. She said the problem was not that employers don't care about the workers but rather that it's difficult for them as well to recognize when breaks are needed to prevent heat illness and so an ongoing mandatory break requirement triggered by hazardous environmental conditions is needed in the interest of prevention.

Dan Bradway said his company had one of the 2005 heat illness incidents at a construction site. He said it's not easy to recognize heat illness in its early stages. He said the day on which the incident occurred was not hotter than 95 degrees Fahrenheit. He said the employee affected had received training and still did not recognize what was happening. He said he worried that if there was a trigger that some employers might not do anything until the trigger was exceeded.

Shade

Len Welsh reminded attendees that 3395 has a requirement for the Board to review the feasibility of provision of shade for break areas by January 1, 2006, so he anticipated it would be discussed at the Board's December 15 meeting when the emergency standard would also be proposed for readoption by the Board. He said he hoped that the attendees of the advisory meeting could work out a compromise that the Board would consider.

Martha Guzman said that it was important to recognize that shade provides an important incentive for employees to take breaks, even if they are being paid on a piece rate basis.

Len Welsh noted that the AGC proposal differs from 3395 with regard to shade. It greatly shortens the definition of "shade" and broadens it to include air conditioned and other spaces "that provides relief from the heat so as to assist the body to cool." The requirement for the shaded rest area also differs in allowing "a means of providing shade" along with other differences. Len Welsh asked if labor representatives liked any part of the AGC proposal. The labor representatives responded that they did not favor the AGC proposals on shade.

Juli Broyles asked if alternative cooling devices to shade could be considered such as handheld spray bottle water misters or fan misters. She said she did not think the options for cooling during the rest and recovery period should be limited to shade.

Martha Guzman proposed separate break and shade requirements in the interest of clarity.

Len Welsh asked why employers opposed a requirement for shade for break areas. Juli Broyles said that sometimes it is not possible to accommodate all the employees who may break at one time with a shaded break area.

Len Welsh said employers' unwillingness to discuss a requirement to provide shade for lunch breaks during hot periods might not be well-received by the Board.

Juli Broyles said that employers are not responsible for employees during the lunch break unless they cannot leave the premises and go to a location of their choosing. Construction employers said that on large worksites over 100 employees may take their breaks at the same time.

Kevin Bland described how he worked as an ironworker in hot conditions in the Palm Desert area. He said that when working hard, the relief of simply stopping work on a hot day was significant and that having to take breaks without protection from the sun was never an issue. He said that he and his co-workers regularly ate lunch in the sun even on very hot days.

Len Welsh asked Kevin Bland if it really was never a problem and Kevin responded that it was not.

Georgina Mendoza responded that the heat incidents in 2005, including deaths, show that lack of access to shade is a problem.

Len Welsh asked employers if employees really have to take their breaks all at the same time. They replied "Yes."

Dan Bradway said that construction employers are not against a requirement for access to shade, but were concerned that such a requirement could be a "slippery slope" to additional requirements.

Georgina Mendoza said the situation of shade may be different in agriculture and construction. She said she had seen agricultural field operations with hundreds of employees breaking in the shade simultaneously. She showed photographs of a number of permanent and temporary shade structures in use in agricultural operations.

A number of construction employers said that most construction sites have shade inherent with nearby structures or once walls are up. They also said many large jobs have air conditioned trailers.

Len Welsh asked if this was the case why were construction employers so concerned with a requirement for providing shaded break areas. He said he thought that many employers already provide shade but that some probably need the additional motivation of a regulatory requirement.

Carl Borden said that agricultural employers shorten workdays and start earlier to reduce heat exposure. Emanuel Benitez refuted this, saying that in his experience most agricultural operations are timed to start at sunrise to take greatest advantage of daylight, usually around 5:30 a.m.

Len Welsh ended the discussion with speculation, based upon the comments noted above, that the Standards Board might conclude that there should be a requirement for shade break areas except in exception situations where it is truly not feasible.

Drinking Water

Representatives of Associated General Contractors reiterated their objections from the September 20 advisory meeting to the specific drinking water quantity requirement of 3395 which reads:

Water shall be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking for the entire shift. Employers may begin the shift with smaller quantities of water if they have effective procedures for replenishment during the shift as needed to allow employees to drink one quart or more per hour.

Len Welsh said that without a quantity specification it was not clear to employers how much water they needed to be prepared to provide employees across the workshift. He said that "sufficient" water as suggested in the AGC proposal did not provide guidance as to the actual quantities that might be needed to prevent heat illness. He reiterated concerns that the reality, or the perception by employees, of insufficient water or insufficient water

replenishment could restrict water consumption on hot days. He said that water is a key control measure for heat illness prevention.

William Jackson said the figure of 2-gallons per day suggested by the requirement for 1 quart per hour seemed to be "made up." Janice Prudhomme said the figure is highly defensible and that it is the standard recommendation of the medical community, the U.S. Centers for Disease Control and Prevention, sports associations, and the U.S. military.

Bob Barish asked construction representatives how they assure drinking water replenishment. Bo Bradley said that on large projects that she is responsible for a worker is assigned to monitor the portable water containers and to refill them once they are half empty. Len Welsh asked how exactly the water supplies are monitored. Bo Bradley said that they walk around and check the individual portable containers. Len Welsh said that the key was to have effective procedures for monitoring and replenishment of the water supplies. He said it was important to be able to deliver 2 gallons per day so that employees would not feel any restriction on consumption in hot conditions. He said that where water was not provided from a plumbed source it was naturally restricted and the only way to avoid discouragement of consumption is very active and consistently effective replenishment.

Bruce Wick said he thought the figure of 2 gallons per person was too high. He thought that 1 gallon per person per 8-hour work shift should be enough to prevent heat illness.

Martha Guzman said that in agricultural situations if water is only available at a headquarters or office location some distance away that was not adequate.

Bob Barish pointed out that the requirement of the regulation is not specifically for 2 gallons per day per employee but rather for a reasonable starting quantity at the beginning of the workshift with a procedure and implementation to supply up to 2 gallons per employee (for an 8-hour workshift) if workers were consuming that much. He said that the key to compliance was to start with sufficient water and actively replenish so as not to discourage consumption. He said he thought it was not unreasonable for a crew of 10 employees on a day when the standard was triggered and without a plumbed water supply to be provided at the beginning of the shift with a water supply of at least 10 quarts (2.5 gallons). He said that if with constant replenishment employees drank less than 2 gallons per day as construction employers contended was more usual then the actual water quantity provided might be lower. He said the language of 3395 only required that the employer be prepared to provide at least 2 gallons per employee (for an 8-hour shift) should consumption rate necessitate it, as the medical literature and authorities suggest it might on some very hot days with heavy work.

Other Issues

Marti Stroup-Fisher said that the standard should not refer to training on personal risk factors because employers are not in a position to know what personal risk factors each employee might have. Martha Guzman said that such training is important so that employees can contribute to their own protection.

Bob Downey reiterated his request from the September 20 meeting that the standard be amended to clarify employer responsibilities on multi-employer worksites.

Bob Downey also said that separate supervisor training was redundant. He said that supervisors and employees should all receive the training needed for prevention and response to heat illness. Len Welsh disagreed, saying that supervisors have responsibilities that employees do not and that they need to be specifically trained on those.

Martha Guzman said that the current 5-minute requirement in 3395 for the rest and recovery period was not adequate to prevent heat illness.

END